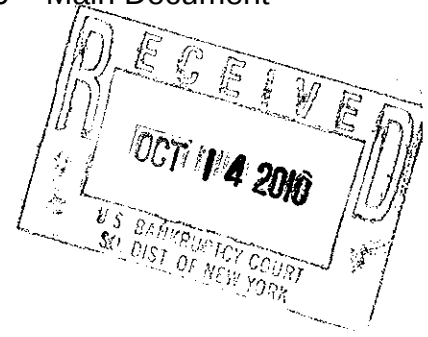


UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK



In re

MOTORS LIQUIDATION COMPANY, et al.,  
f/k/a General Motors Corp., et al.  
Debtors.

Chapter 11 Case No.  
09-50026 (REG)  
(Jointly Administered)

Motion for Relief of Stay and Objection to Debtor's Proposed Disclosure Statement with  
Respect to Debtor's Joint Chapter 11 Plan

1. The Interested party and prospective claimant, Tracy Woody, filed a lawsuit in Wake County Courthouse, Raleigh, North Carolina before I was notified regarding bankruptcy status of the included Defendant f/k/a General Motors Corporation, Motors Liquidation Company or collectively "GM") which lawsuit included claims of product liability of manufactured defects from the purchase of their manufactured Chevrolet Suburban SUV model. Claims in the case also included Magnuson-Moss Warranty Act, Uniform Commercial Code Summary entitling a Revocation of contract, exist several legitimate claims in this case that I have stated with specificity including evidence supplied partly by GM themselves and as a result of a lawsuit filed previously against GM the manufactured defects in the SUV where the instrument cluster, speedometer or stepper motor and a panel cluster problem were defective noted by a mechanic that provided a repair of the SUV purchased and the over 2 year time period that I was not aware of those manufactured defects and non performance cause me to experience financial hardship and downtime that impacted my having a reliable vehicle for work and

expense helped plunge me into bankruptcy. The lawsuit states that over \$9,000 was sought with collective parties that included GM that was paid into the vehicle and repeatedly did not perform and conform.

2. I am requesting a Relief of Stay against GM so that I may permit litigation in a non bankruptcy forum, Wake County Courthouse District Court, Raleigh, North Carolina, to proceed with my claims against GM in which product liability including manufacturers defects are addressed with the Chevrolet Suburban SUV manufactured by GM.

3. I object to the Disclosure statement in that my case is not finalized on my involvement as a claimant until it is finalized in the Wake County Courthouse Court and any appellant procedures request that my claim is not settled in this statement or future statement until there are final hearing procedures administered against GM in the Wake County Courthouse existing case #09-CV-015458 in the District Court. I propose that I will be able to submit my claim and not be finalized by the Chapter 11 Plan and Disclosure statement until final action is rendered in the Wake County Courthouse and appellant procedures as necessary for consideration to the Bankruptcy Court on final renderings once all my Court options have been addressed.

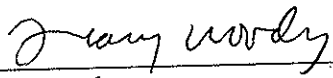
I pray that this Honorable Court grant the following:

1. Allow for my Relief of Stay to permit the litigation to continue against GM due to issues of product liability and manufactured defects at the time of purchasing a Chevrolet Suburban SUV manufactured by GM.

2. *The Disclosure statement and Plan be open in regards to my claims against*

GM as an interested party and prospective claimant to address the Bankruptcy Court once an Order has been granted against GM in a non Bankruptcy Court of manufactured product liability and any damages that will be addressed in the Wake County Courthouse District Division and any appellant procedures.

This 12<sup>th</sup> day of October, 2010

  
\_\_\_\_\_  
Tracy Woody  
4908 Vallery Place  
Raleigh, NC 27604  
(919) 349-3418

CERTIFICATE OF SERVICE

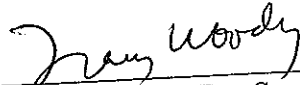
This is to certify that the undersigned has this date served a copy of the foregoing Motion and Objection by depositing a copy of the same in the United States Mail, postage paid or by UPS, in an envelope addressed as noted below by Mail to Debtors:

Honorable Robert E. Gerber  
United States Bankruptcy Judge  
Room 621 of the US Bankruptcy Court for the Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, NY 10004-1408<sup>15</sup>

Clerk of Bankruptcy Court  
One Bowling Green  
New York, NY 10004-1408<sup>15</sup>

Attorneys for Debtors  
Weil, Gotshal & Manges LLP, 767 Fifth Ave., New York, NY 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.), the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger), General Motors, LLC, 400 Renaissance Center, Detroit, MI 48265 (Attn: Lawrence S. Buonomo, Esq.), Cadwalader, Wickersham & Taft LLP, attorneys for the U. S. Dept of the Treasury, One World Financial Center, NY, NY 10281 (Attn: John J. Rapisardi, Esq.) (f) - (l) of the attached sheet.

This 12th day of October, 2010.

  
Tracy Woody, Pro Se

Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (c) the Debtors, c/o Motors Liquidation Company, 500 Renaissance Center, Suite 1400, Detroit, Michigan 48243 (Attn: Ted Stenger); (d) General Motors, LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (e) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (f) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, DC 20220 (Attn: Joseph Samarias, Esq.); (g) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (h) Kramer Levin Naftalis & Frankel LLP, attorneys for the statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Mackoud, Esq., and Jennifer Sharret, Esq.); (i) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy H. Davis, Esq.); (j) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (k) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. MacLay, Esq.); and (l) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.).